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5 UNITED STATES BANKRUPTCY COURT
6 NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

7 In re:) Case No. 13-46340-WJL-13
8 JOHN D. FLORES,)
9 Debtor.) Chapter 13
10) NOTICE OF MOTION FOR CONTEMPT
11) AND DAMAGES AGAINST RAZOR
12) CAPITAL, LLC
13) Date: August 26, 2015
14) Time: 10:30 a.m.
15) Courtroom: 220
) Judge: The Honorable William Lafferty
)
)

16 TO: RAZOR CAPITAL, LLC, THE UNITED STATES TRUSTEE, CHAPTER 13
17 TRUSTEE MARTHA BRONITSKY, AND THIS HONORABLE COURT

18 Please take Notice that a hearing will be held on **August 26, 2015**, at **10:30 a.m.**, at
19 1300 Clay St., Suite 300, Oakland, California 94612, Courtroom 220 on the motion of **John**
20 **Flores** ("Debtor") against **Razor Capital, LLC** ("Razor" for Contempt and Damages for
21 violations of the Bankruptcy Automatic Stay (11 U.S.C. § 362), violations of the Bankruptcy
22 Stay of Action Against Codebtor (11 U.S.C. § 1301), and Contempt of Court under 11 U.S.C. §
23 105.

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25 The Motion is based upon:
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27 1. this **Notice of the Motion**;

2. the Motion For Contempt And Damages Against Razor Capital, LLC;
3. the Memorandum Of Points And Authorities In Support Of Motion For Contempt
And Damages Against Razor Capital;
4. the Declaration of Attorney Geoffrey E. Wiggs In Support Of Motion for Contempt
and Damages Against Razor Capital;
5. the Declaration of Debtor John Flores In Support Of Motion for Contempt
and Damages Against Razor Capital;
6. all Exhibits attached hereto; and
7. such further evidence and oral argument as may be presented to the Court at the hearing.

This matter is governed by Bankruptcy Local Rule 9014-1 and Bankruptcy Rules of Procedure 9014, 9011, and 9020. Any opposition to this motion must be submitted at least 14 days prior to the scheduled hearing. Any reply to said opposition must be submitted at least 7 days

Any party wishing to respond to Debtor's Motion should appear personally or through counsel at the hearing. Failure to do so could result in the Court entering the requested relief by default.

LAW OFFICES OF GEOFFREY E. WIGGS

DATED: August 5, 2015

/s/ Geoffrey E. Wiggs
GEOFFREY E. WIGGS
Attorney for John Flores and Gina Flores